

IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF PENNSYLVANIA

JUSTINA CHAPPELL, )  
AS ADMINISTER OF THE ESTATE )  
OF DELYLE WALTER CHAPPELL, )  
 )  
*Plaintiff,* )

v. )

C.A. No. 3:23-cv-00604-RDM

PRECISION DRILLING )  
CORPORATION, PRECISION )  
DRILLING COMPANY, LP, )  
CABOT OIL & GAS CORPORATION, )  
COTERRA ENERGY, INC., )  
FORUM ENERGY )  
TECHNOLOGIES, INC., AND FORUM )  
ENERGY SERVICES, INC. )  
 )  
*Defendants.* )

**PRECISION DRILLING CORPORATION AND PRECISION**  
**DRILLING COMPANY, LP'S ANSWER TO FORUM ENERGY**  
**TECHNOLOGIES, INC. AND**  
**FORUM ENERGY SERVICES, INC.'S CROSSCLAIMS**

Defendants Precision Drilling Corporation and Precision Drilling  
Company, LP (collectively, "Precision"), by and through their undersigned  
counsel; Bradley Arant Boult Cummings, LLP, hereby file an Answer to  
Forum Energy Technologies, Inc. and Forum Energy Services, Inc.'s Cross

claims against Precision (“Crossclaims”). Unless specifically admitted, each allegation in the Crossclaims is denied.

1. The allegations on Paragraph 1 of the Crossclaims constitute legal conclusions to which no response is required. To the extent a response is required, those allegations are denied.

2. Paragraph 2 of the Crossclaims is a statement of incorporation to which no response is required. To the extent a response is required, Precision incorporate its responses to the Paragraphs in Plaintiffs’ Complaint referenced in Paragraph 2 of the Crossclaims.

3. The allegations in Paragraph 3 of the Crossclaims constitute legal conclusions to which no response is required. To the extent a response is required, the allegations are denied.

WHEREFORE, Precision respectfully requests dismissal of the Crossclaims against Precision, a judgment in its favor, and any other relief that the court deems just and proper.

Respectfully submitted,

/s/ Jeffrey S. Davis  
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**CERTIFICATE OF SERVICE**

I certify that on August 21, 2023, I filed the foregoing through the Court's CM/ECF filing program.

/s/ Jeffrey S. Davis  
Jeffrey S. Davis